

In The United States District Court  
for the Middle District of Alabama  
Northern Division

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William David Carroll : 2006 JUL 17 A 9:53  
Plaintiff : Civil Action No. 16 CLK  
V. : 2:06-CV-549-MEF  
Anthony Clark : MIDDLE DISTRICT COURT  
Ameth Cain : ALABAMA  
Millard H. McWhorter III M.D. :  
Defendants

Motion To Warrant Consideration by the Court  
and Motion For Leave To Amend;

Comes now the plaintiff William David Carroll pro se, moves the honorable court for a Warrant Consideration, and for leave to Amend and as therefore states the following grounds,

Interrogatories

- 1 How many inmates are on this long list to see the dentist?
- 2 How many inmates have been seen by the dentist since June 12<sup>th</sup> 2006 until present date?

- 3 What is the dentist's name that treated these inmates?
- 4 What are the names of the inmates that have been treated or seen by the dentist since June 12<sup>th</sup>, 2006 until present date, and what are the dates in which each one was treated or seen by the dentist?
- 5 What number am I on your dental list?
- 6 How is the County billed for inmate dental visits?
- 7 How often does the County pay the dental bill?
- 8 Why won't the dentist see or treat anyone from the Covington County jail?
- 9 Does the Covington County jail have a dentist?
- 10 Does the Covington County jail have an unpaid dental bill?
- 11 On what date was bill paid?

- 12 Why does it take over (30) days to see a dentist when you have a dental emergency?
- 13 What is considered a dental emergency at the Covington County Jail?
- 14 How many times have I been to sick-call since June 12<sup>th</sup>, 2006 involving the same abscessed tooth?
- 15 Has my tooth been abscessed (2) different times within a (3) week period?
- 16 Why do I have to keep signing up for sick-call every (7) days and repay a medical co-payment for a continuing or on going problem that could be solved by seeing a dentist?
- 17 What is the date of my dental appointment?
- 18 Do I have a dental appointment date?
- 19 What is the long term effect of my taking these medications for extended periods?
- 20 What is the normal/extended time limit

on each dosage prescribed to me?

- 21 Haven't people died from having abscessed teeth?
- 22 What is the long term affect on having an abscessed tooth for an extended time period?
- 23 Is it normal for a medical staff to continue to put off treatment to a permanent solution?
- 24 Why am I being denied dental treatment?

Respectfully submitted this the 13<sup>th</sup> day of  
July, 2006.

William David Carroll

Signature of Plaintiff

Certificate of Service

I certify that a true copy of the foregoing Amend  
has been served upon the defendants, by mailing  
the same United States mail first class, personal  
service on the 13<sup>th</sup> day of July, 2006.

Copies served upon all

William David Carroll

defendants:

Anthony Clark

Ammett Cain

William H. McWhorter III M.D.

Signature of Plaintiff